



California Regional Water Quality Control Board

San Diego Region

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September 22, 2009

Mr. A. C. Entingh
Head, Environmental Compliance Department
AC/S Environmental Security
U.S. Marine Corps Base
P.O.Box 555008
Camp Pendleton, CA 92055-5008

VIA CERTIFIED MAIL
7007 0710 0000 5763 4694

In reply refer to:
259163:rpierce

Dear Mr. Entingh:

SUBJECT: NOTICE OF VIOLATION NO. R9-2009-0158, REVIEW OF MONITORING REPORTS FOR ORDER NO. 97-13 WASTE DISCHARGE REQUIREMENTS, (REF: 5090.7C ENVSEC/427)

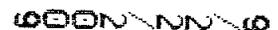
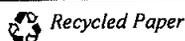
Enclosed is **Notice of Violation (NOV) No. R9-2009-0158** for United States Marine Corps (USMC) Sewage Treatment Plant No. 11 (San Onofre) located in Marine Corps Base Camp Pendleton, California. The California Regional Water Quality Control Board, San Diego Region (Regional Board) identified the violations cited in the NOV during the review of the nine monthly Monitoring Reports for the time period of July 2007 through March 2009 submitted in accordance with Order No. 97-13.

The USMC reported that corrective actions have been taken to address violations of the reporting requirements. The facility must operate and maintain backup or auxiliary power systems to comply with the conditions of this Order. In addition, the Reporting Limits for antimony, cadmium, and beryllium [11.1 micrograms per liter ($\mu\text{g/L}$)] for the July 10, 2007 effluent sample were greater than their respective maximum contaminant levels (MCLs: 6, 5, and 4 $\mu\text{g/L}$, California Department of Public Health, 2006), and also were over 20 times greater than the published detection levels of the analytical method employed (US EPA method 200.8). The Regional Board requests that the U.S. Marine Corps provide lower reporting limits for these metals to below their respective MCLs in future analysis.

The next required monitoring report is the July through September 2009 quarterly report due by October 31, 2009.

In the subject line of any response, please include the requested "in reply refer to:" information located in the heading of this letter. If you have any questions regarding this

California Environmental Protection Agency



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IN THE MATTER OF)

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United States Marine Corps)
Marine Corps Base)
Camp Pendleton, CA 92055-5008)

**NOTICE OF VIOLATION
NO. R9-2009-0158**

**In reply refer to:
259163:rpierce**

Waste Discharge Requirements: Order No. 97-13

Facility: Sewage Treatment Plant No. 11 (San onofre), Marine Corps Base Camp Pendleton, California, San Diego County

YOU ARE HEREBY NOTIFIED THAT:

The U.S. Marine Corps (USMC) violated waste discharge requirements issued by Order No. 97-13 *Waste Discharge Requirements for United States Marine Corps, Marine Corps Base Camp Pendleton, California, Horno Sewage Treatment Plant (10) & San Onofre Sewage Treatment Plant (11), San Diego County*. These violations subject the USMC to possible further enforcement action by the California Regional Water Quality Control Board, San Diego Region (Regional Board), including administrative enforcement orders requiring USMC to cease and desist from violations, or to clean up waste and abate existing or threatened conditions of pollution or nuisance; and referral to the State Attorney General for injunctive relief.

The Regional Board reviewed the seven Monitoring Reports listed below.

PERIOD	REPORT DATE	DATE RECEIVED
July- September 2007	October 29, 2007	October 30, 2007
October- December 2007	January 29, 2008	January 30, 2008
January- December 2007	January 29, 2008	January 30, 2008
January- March 2008	April 29, 2008	April 30, 2008
March- June 2008	July 29, 2008	July 30, 2008
July- September 2008	October 28, 2008	October 30, 2008
October- December 2008	January 29, 2009	January 30, 2009
January- December 2008	January 29, 2009	January 30, 2009
January- March 2009	April 29, 2009	April 30, 2009

Four total violations of Order No. 97-13 were identified for deficient Monitoring Reports resulting from improper sampling technique and reporting, and failure to operate and maintain the facility to achieve compliance with conditions of the Order. The USMC has reported taking corrective actions in response to reporting violations including additional contractor training, full spill recovery, and repairs related to power failures. The facility must operate and maintain backup or auxiliary power systems to comply with the conditions of this Order.

Summary of Violations:

I. MONITORING AND REPORTING PROGRAM, ORDER NO. 97-13

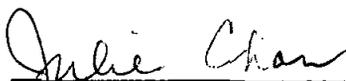
The Order requires the USMC to comply with the Monitoring and Reporting Program No. 97-13, including Effluent Monitoring Requirement B.1 requiring weekly samples for biochemical oxygen demand (BOD) and total suspended solids (TSS), and continuous flow recording.

A deficient report was submitted three times: January-March 2008, July-September 2008, and January-March 2009. Power failures caused the effluent flow meter to stop recording continuously on January 20, 2008, September 3, 2008 and January 11, 2009. Also in January 2009, samples for BOD and TSS were not collected properly the weeks of January 6, January 13, and January 20. The report also states that samples for total organic carbon (TOC) were not collected, however TOC samples are not required by the Order.

II. FACILITY DESIGN AND OPERATION SPECIFICATIONS C.1.

The Order requires the USMC to operate and maintain all facilities and systems which are used to achieve compliance with conditions of the Order, including effective performance, adequate operator staffing and training, and adequate quality assurance procedures.

Three separate power failures caused the effluent flow meter to stop recording continuously three times: January 20, 2008; September 3, 2008, and January 11, 2009. The USMC corrected the individual causes of these failures, but the lack of backup or auxiliary power supply has caused repeated reporting violations. The USMC failed to operate and maintain the facility to achieve compliance with the conditions of the Order.



Julie Chan, Supervising Engineering Geologist
Groundwater Basins Branch
JAC:bm:rep

9/22/09

DATE

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PS Form 3800, August 2006 See Reverse for Instructions

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 Camp Pendleton, CA 92055-5008

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